

June 18, 2008

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Comments pertaining to PS 06-229 and WT 06-150

Public safety needs a broadband communications network. The FCC must require the broadband network be built to hardened public safety standards that will withstand extended power failures and extreme environmental events.

If the public private partnership comes to fruition, the FCC must allow greater flexibility for early local agency system implementation in areas where the public/private broadband network build out is delayed or is unlikely to occur.

The FCC must expeditiously address the narrowband relocation process. The delay encountered to date has already had a negative impact on public safety's ability to deploy critical systems. The FCC should immediately start processing applications for narrowband spectrum utilizing the new band plan so as to not delay any further the implementation of critical public safety communications systems.

A process must be developed to obtain relocation cost estimates from each agency through the Public Safety Spectrum Trust. The ten million dollar cap should be re-evaluated as it appears to be insufficient to fund the relocation of existing users.

Since the entire 700 band has been impacted by frequency repacking as part of the new band plan the FCC must amend its rules to make all 700 users eligible for relocation funding. In the event there is no public/private partnership and the D block licensee is not required to fund relocation the FCC must provide funding to facilitate the relocation. Under no circumstances should the incumbent 700 users be burdened with this expense.

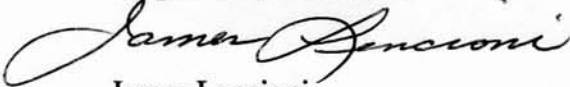
The February 17, 2009 deadline must be extended. The February 17, 2009 deadline is unrealistic given the D block auction delay and given no funding has been forthcoming to facilitate relocation of the incumbent 700 users. The FCC must allow sufficient time between receiving relocation funds and the deadline on the agency to relocate all narrowband equipment to the new band plan.

The FCC should under no circumstances mandate any public safety user to subscribe or purchase minutes on the broadband network. Such an unfunded mandate is not in the best interest of public safety and could present a financial hardship on some agencies. It should be left to the discretion of the individual public safety agencies if subscribing makes good business sense.

The Public Safety Broadband Licensee should be a non-profit organization. No commercial interest should hold this licensee. The licensee should be a non-profit organization, and be a broadly representative of the public safety radio user community as possible.

The FCC should establish OOB limits on the D block licensee regardless of the relationship be it public/private or not. There needs to be established emission standards in place to protect all parties as well as establish uniform spectrum management.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James Lencioni", written in a cursive style.

James Lencioni  
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